

February 3, 2021

Ms. Marlene Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Affordable Connectivity Program, WC Docket No. 21-450

Dear Ms. Dortch:

The undersigned groups—Asian Americans Advancing Justice, Benton Institute for Broadband & Society¹, MediaJustice, New America’s Open Technology Institute, Public Knowledge—are looking forward to the implementation of the Affordable Connectivity Program (ACP), which will help millions of households across the country afford internet service during a time when they need it the most. We are particularly excited for the prospect of this program helping bridge the digital divide for those communities who already experience unequal access to basic resources like broadband, impacting their ability to exercise their civil rights. To ensure that this program reaches historically marginalized groups, however, requires that the Commission commit effective resources and energy into ensuring that these communities hear about this opportunity through outreach and materials that they can understand.

We recommend the Commission properly review ACP toolkit materials before publication to ensure that appropriate languages and translations are used for the intended audience. That includes considering unique dialects or terms within language groups based on geographical and generational nuances. We reiterate a recommendation made in a previous letter

¹ These comments reflect the institutional view of the Benton Institute for Broadband & Society, and, unless obvious from the text, is not intended to reflect the views of its individual officers, directors, or advisors.

from a configuration of this group of organizations committed to the intersection of broadband access and civil rights that the Commission ensures all information and publicity materials and campaigns are available in many languages beyond English, use language and marketing practices that are at a minimum accurate, as well as culturally relevant and inclusive.² We especially urge the Commission to review its website, marketing materials, social media, outreach kits, and other publicity resources for language translation accuracy, and request that they consider hiring native or near native speakers who understand American context and vernacular to review all materials for translation accuracy, but also readability.

For instance, the materials on ACP translated to Korean and Spanish heavily feature the word “broadband.” In Spanish, broadband directly translates to “banda ancha,” which is not a commonly used term to describe internet access. Instead a preferable translation would be “internet de alta velocidad” or high speed internet. In Korean, “internet” (“인터넷”) might actually be the more commonplace term to refer to broadband internet service. The translation also refers to service providers as “업체” or companies, when “통신사” which more closely translates to “telecommunications provider,” might be a more fitting term.

It’s also important that those responsible for translations are not just fluent in the language, but fluent in how that language is used by those situated within U.S. communities. Technically accurate translations may not be recognizable or accessible to people who speak that language in the United States and thus translators should be fluent in how that language is used by those within this country.

² Letter from American Civil Liberties Union, Benton Institute for Broadband & Society, Common Cause, Free Press, Joint Center for Political and Economic Studies, MediaJustice, National Hispanic Media Coalition, New America’s Open Technology Institute, Public Knowledge, and UnidosUS to Wireline Competition Bureau on Emergency Broadband Benefit Program, WC Docket No. 20-445, February 16, 2021, <https://www.fcc.gov/ecfs/filing/10216230510651>

The Commission should also commit to reviewing and potentially editing outreach materials to improve baseline awareness about the program and ensure that the ACP benefit remains accessible for beyond just English speakers.

If you have any further questions, please contact Claire Park, Policy Analyst, New America's Open Technology Institute, at park@opentechinstitute.org.

Respectfully Submitted,

Asian Americans Advancing Justice
Benton Institute for Broadband & Society
MediaJustice
New America's Open Technology Institute
Public Knowledge

/s/ Claire Park

Claire Park
Policy Analyst
New America's Open Technology Institute